

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

MARCH 24 2011
WILLIAM M. McCOOL, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STANLEY STEVENS,
RICKY RISTICK,
ROBERT "BOB" RISTICK,
(a/k/a Nick Davis),
MILLER STEVENS,

Defendants.

CR 11 NO. 5183 RBL

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Commit Offenses against the United States)

1. Beginning at least as early as late 2005 and continuing through at least the end of 2007, within Pierce County in the Western District of Washington and elsewhere, defendants STANLEY STEVENS, RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER STEVENS, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with persons known and unknown to the Grand Jury to commit offenses against the

1 United States, to wit: (a) odometer tampering, in violation of Title 49, United States
2 Code, Sections 32703(2) and 32709(b); (b) making of false odometer statements, in
3 violation of Title 49, United States Code, Sections 32705(a) and 32709(b); (c) making,
4 uttering, and possessing counterfeit and forged securities of a State, with intent to deceive
5 another person, organization, and government, in violation of Title 18, United States
6 Code, Section 513; and (d) money laundering, in violation of Title 18, United States
7 Code, Section 1957.

8 **Purpose of the Conspiracy**

9 2. The purpose of this conspiracy was to purchase used vehicles from third
10 parties; roll back the odometers on those vehicles to reflect a false, substantially lower
11 mileage; and sell the vehicles with false, low mileage figures to purchasers at higher
12 prices than the purchasers would have paid if they had known the vehicles' true mileages.

13 **Manner and Means of the Conspiracy**

14 3. It was part of the conspiracy that, at times relevant and material to this
15 Indictment, defendants STANLEY STEVENS, RICKY RISTICK, ROBERT "BOB"
16 RISTICK (a/k/a Nick Davis), and MILLER STEVENS were engaged in the buying and
17 selling of used motor vehicles.

18 4. It was further part of the conspiracy that defendants STANLEY STEVENS,
19 RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER
20 STEVENS, and other co-conspirators, bought and sold numerous vehicles, including the
21 following specifically addressed herein:
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<u>Vehicle No.</u>	<u>Year</u>	<u>Make</u>	<u>Vehicle Identification Number</u>
1	2001	Ford	1FTRW08W11KE08785
2	2000	Suzuki	JS3TD62V5Y4126888
3	2000	Toyota	5TBBT4412YS088738
4	1999	Chevrolet	2GCEK19T0X1171784
5	2003	Toyota	5TEWM72N63Z296176
6	2001	Dodge	1B7HF13Z61J238660
7	1998	Dodge	3B7HF13Z2WG186761
8	1999	Toyota	JT2BG22K2X0314704
9	1997	Dodge	1B7GG23Y9VS213354
10	2000	Chevrolet	1GCGK29U4YE193925

5. It was further part of the conspiracy that defendants STANLEY STEVENS, RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER STEVENS purchased high-mileage used motor vehicles for resale using the names One Stop Auto and RSV Auto, among others, from private companies, automobile dealers, and individuals in Washington, Oregon, and elsewhere.

6. It was further part of the conspiracy that defendants STANLEY STEVENS, RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER STEVENS, in connection with purchasing high-mileage used motor vehicles, obtained and caused to be obtained Carfax vehicle history reports prior to purchasing vehicles.

7. It was further part of the conspiracy that, after purchasing vehicles, defendants STANLEY STEVENS, RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER STEVENS caused the vehicles' odometers to be rolled back to lower mileage figures (vehicles with such altered odometers are called "rolled-back vehicles"). The defendants caused at least 75 odometers to be brought to a speedometer repair shop in Puyallup, Washington, to have the odometers reset to specified mileage figures.

1 8. It was further part of the conspiracy that defendants STANLEY STEVENS,
2 RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER
3 STEVENS falsely certified on forms provided by the Puyallup speedometer repair shop
4 that the false, low mileage figures for the odometers were accurate.

5 9. It was further part of the conspiracy that defendants STANLEY STEVENS,
6 RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER
7 STEVENS caused false, low mileages to be written on titles of vehicles they purchased.
8 In some instances the sellers had not inserted the actual high mileage figures on the title,
9 allowing the defendants to insert a false, low mileage figure; in other instances the
10 defendants altered and caused to be altered the high mileage figures that the sellers had
11 written on the titles. In each instance, the false mileage figures on those documents
12 corresponded to the false, low mileage odometer readings on the rolled-back vehicles.

13 10. It was further part of the conspiracy that defendants STANLEY STEVENS,
14 RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER
15 STEVENS caused the rolled-back vehicles to be sold to purchasers in the Western
16 District of Washington and elsewhere.

17 11. It was further part of the conspiracy that in connection with the sale of the
18 rolled-back vehicles, defendants STANLEY STEVENS, RICKY RISTICK, ROBERT
19 "BOB" RISTICK (a/k/a Nick Davis), and MILLER STEVENS provided false, low-
20 mileage odometer disclosure statements to subsequent purchasers.

21 12. It was further part of the conspiracy that in connection with the purchase
22 and sale of some vehicles, defendants STANLEY STEVENS, RICKY RISTICK,
23 ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER STEVENS misrepresented
24 their identities, and their relationships to the prior owners, to mislead the buyers and
25 prevent the detection of their scheme.

26 13. It was further part of the conspiracy that defendants STANLEY STEVENS,
27 RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER
28 STEVENS's actions and misrepresentations led the defendants to receive higher prices

1 for the vehicles sold than they would have received if the vehicles had correct mileage
2 readings, and that buyers of the vehicles, including ultimate consumers, paid more for the
3 vehicles than they would have paid if they had known the vehicles' true mileage. The
4 defendants caused more than \$200,000 in losses to approximately 75 vehicle purchasers
5 from this scheme.

6 OVERT ACTS

7 14. In order to accomplish the objects and purposes of the conspiracy,
8 defendants STANLEY STEVENS, RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a
9 Nick Davis), and MILLER STEVENS did commit numerous overt acts, in the Western
10 District of Washington and elsewhere, among which were the following:

11 a. On or about December 2, 2005, defendant RICKY RISTICK caused
12 an account to be opened at Bank of America in the name of RSV Auto, which held funds
13 used to purchase vehicles, and held funds derived from the sale of vehicles.

14 Vehicle No. 1

15 b. On or about June 29, 2006, a co-conspirator using a Carfax account
16 in the name of RICKY RISTICK obtained a Carfax report relating to Vehicle No. 1.

17 c. In or around June 2006, defendant ROBERT "BOB" RISTICK
18 (a/k/a Nick Davis) met the owner of Vehicle No. 1 and negotiated a purchase price of
19 \$12,000 for the vehicle, the odometer of which showed mileage of at least 105,000 miles.

20 d. On or about June 29, 2006, a co-conspirator withdrew \$12,000 from
21 the RSV Auto at Bank of America to purchase a cashier's check.

22 e. On or about June 29, 2006, defendant RICKY RISTICK met with
23 the owner of Vehicle No. 1 and paid him \$12,000 for the vehicle.

24 f. On or about June 30, 2006, defendant STANLEY STEVENS
25 requested that an odometer repair shop in Puyallup, Washington, set the mileage on the
26 odometer of Vehicle No. 1 to read 58,241.

27 g. On or about July 18, 2006, ROBERT "BOB" RISTICK (a/k/a Nick
28 Davis) sold Vehicle No. 1 for \$14,000 to an automobile dealership in Wenatchee,

1 Washington, falsely certifying that the odometer reading on Vehicle No. 1 was 58,912
2 miles.

3 Vehicle No. 2

4 h. On or about July 11, 2006, a co-conspirator using a Carfax account
5 in the name of RICKY RISTICK obtained a Carfax report relating to Vehicle No. 2.

6 i. On or about July 12, 2006, defendant RICKY RISTICK and a co-
7 conspirator purchased from a private party in Lacey, Washington, Vehicle No. 2, the
8 odometer of which showed mileage of at least 150,574 miles, for \$4,500.

9 j. On or about July 14, 2006, defendant STANLEY STEVENS
10 requested that an odometer repair shop in Puyallup, Washington, set the mileage on the
11 odometer of Vehicle No. 2 to read 57,728.

12 k. On or about September 8, 2006, defendant RICKY RISTICK traded
13 Vehicle No. 2, with a false odometer reading of 58,863, to a private party in Tacoma,
14 Washington, in exchange for a 1992 Bounder motor home.

15 Vehicle No. 3

16 l. On or about July 19, 2006, a co-conspirator using a Carfax account
17 in the name of RICKY RISTICK obtained a Carfax report relating to Vehicle No. 3.

18 m. On or about July 19, 2006, defendant MILLER STEVENS
19 purchased from a private party in Montesano, Washington, Vehicle No. 3, the odometer
20 of which showed a mileage of at least 126,000, for \$12,400.

21 n. On or about July 19, 2006, defendant STANLEY STEVENS
22 requested that an odometer repair shop in Puyallup, Washington, set the mileage on the
23 odometer of Vehicle No. 3 to read 39,520.

24 o. On or about July 28, 2006, defendant MILLER STEVENS sold
25 Vehicle No. 3 for \$15,000 to a private party in Tacoma, Washington, with a false
26 odometer reading of approximately 39,500 miles.

1 p. On or about August 16, 2006, defendant MILLER STEVENS agreed
2 to repurchase Vehicle No. 3 from the private party to whom he had sold it for \$15,000,
3 after the purchaser discovered the false odometer reading and demanded his money back.

4 q. On or about August 22, 2006, defendant MILLER STEVENS sold
5 Vehicle No. 3 to another private party in Puyallup, Washington, with a false odometer
6 reading of approximately 40,368 miles.

7 Vehicle No. 7

8 r. On or about October 31, 2006, a co-conspirator using a Carfax
9 account registered to an address associated with One Stop Auto obtained a Carfax report
10 relating to Vehicle No. 7.

11 s. On or about November 1, 2006, defendant STANLEY STEVENS,
12 accompanied by defendant RICKY RISTICK, purchased Vehicle No. 7 from a private
13 party in Puyallup, Washington, with an odometer reading approximately 121,210 miles,
14 for \$8,500. During the transaction, defendant STANLEY STEVENS asked the seller not
15 to write the mileage on the title.

16 t. On or about November 1, 2006, a co-conspirator, using funds from
17 the RSV Auto account at Bank of America, purchased an \$8,000 cashier's check made
18 out to the private party from whom defendant STANLEY STEVENS purchased Vehicle
19 No. 7.

20 u. On or about November 1, 2006, defendant STANLEY STEVENS
21 requested that an odometer repair shop in Puyallup, Washington, set the mileage on the
22 odometer of Vehicle No. 7 to read 50,250.

23 v. On or about November 2, 2006, defendant STANLEY STEVENS
24 sold Vehicle No. 7 to an automobile dealership in Everett, Washington, for \$10,000 with
25 a false odometer reading of approximately 50,300 miles.

26 w. On or about November 2, 2006, defendant RICKY RISTICK caused
27 to be deposited into the RSV Auto bank account at Bank of America a \$10,000 check
28 from the automobile dealership that purchased Vehicle No. 7.

1 All in violation of Title 18, United States Code, Section 371.

2
3 **COUNTS 2 - 11**
4 **(Odometer Tampering)**

5 15. Paragraphs 1 through 14 of Count 1 are realleged and incorporated herein
6 by reference.

7 16. On or about the dates listed below, within the Western District of
8 Washington, defendants STANLEY STEVENS, RICKY RISTICK, ROBERT "BOB"
9 RISTICK (a/k/a Nick Davis), and MILLER STEVENS did knowingly and willfully reset
10 and alter, and cause to be reset and altered, the odometers in the motor vehicles listed
11 below from the approximate high mileages to the approximate low mileages listed below,
12 with the intent to change the number of miles indicated on said odometers, each such
13 instance being a separate and additional Count of this Indictment:

<u>Count</u>	<u>Vehicle No.</u>	<u>Date</u>	<u>Approximate High Mileage</u>	<u>False, Low Mileage</u>
2	1	June 30, 2006	105,000	58,241
3	2	July 14, 2006	150,574	57,728
4	3	July 19, 2006	126,000	39,520
5	4	September 21, 2006	188,224	124,900
6	5	September 22, 2006	97,000	46,131
7	6	October 16, 2006	105,033	66,500
8	7	November 1, 2006	121,210	50,250
9	8	November 17, 2006	160,759	69,000
10	9	December 17, 2006	157,938	77,900
11	10	January 6, 2007	192,000	64,521

25 All in violation of Title 49, United States Code, Sections 32703(2) and 32709(b),
26 and Title 18, United States Code, Section 2.

COUNTS 12 – 15
(False Odometer Statements)

17. Paragraphs 1 through 14 of Count 1 are realleged and incorporated herein by reference.

18. On or about the dates listed below, in the Western District of Washington, defendants STANLEY STEVENS, RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a Nick Davis), and MILLER STEVENS did knowingly and willfully give and cause to be given, in making the written disclosures to the buyers of used motor vehicles required by Title 49, United States Code, Section 32705(a), and Title 49, Code of Federal Regulations, Part 580, false statements relating to the cumulative mileage registered on the odometers of the motor vehicles listed below, in that the defendants certified as accurate the false mileages listed below, when in fact the odometers of the vehicles had registered the high mileages listed below when the defendants acquired the vehicles, each such instance being a separate and additional Count of this Indictment:

<u>Count</u>	<u>Vehicle No.</u>	<u>Date</u>	<u>High Mileage</u>	<u>False Mileage</u>
12	4	September 21, 2006	188,224	124,900
13	6	October 17, 2006	105,033	66,561
14	7	November 2, 2006	121,210	50,300
15	10	January 15, 2007	192,000	64,741

All in violation of Title 49, United States Code, Sections 32705(a) and 32709(b), and Title 18, United States Code, Section 2.

COUNTS 16 – 23
(Counterfeit and Forged Securities)

19. Paragraphs 1 through 14 of Count 1 are realleged and incorporated herein by reference.

1 20. On or about the dates listed below, in the Western District of Washington,
2 defendants STANLEY STEVENS, RICKY RISTICK, ROBERT "BOB" RISTICK (a/k/a
3 Nick Davis), and MILLER STEVENS knowingly made, uttered, and possessed, and
4 willfully caused the making, uttering, and possession of, counterfeit and forged securities
5 of the State of Washington, that is, automobile titles and title extension statements, with
6 the intent to deceive other persons, organization, and governments, as set forth in each
7 count below:

<u>Count</u>	<u>Vehicle No.</u>	<u>Date</u>
16	1	July 18, 2006
17	2	September 8, 2006
18	3	July 28, 2006
19	5	September 23, 2006
20	6	October 17, 2006
21	8	November 24, 2006
22	9	December 17, 2006
23	10	January 15, 2007

23 All in violation of Title 18, United States Code, Section 513(a), and Title 18,
24 United States Code, Section 2.

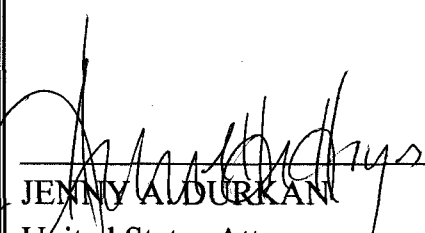
1 DATED this 24 day of march, 2011.


2 A TRUE BILL:

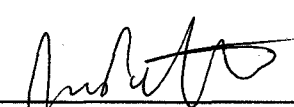
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4 DATED: march 24, 2011

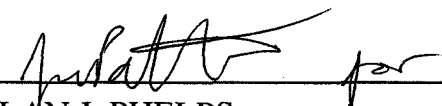
5 Signature of Foreperson redacted
6 pursuant to the policy of the
7 Judicial Conference of the United States.

8 FOREPERSON _____

9
10 
11 JENNY ALDURKAN
12 United States Attorney

13
14 
15 CARL BLACKSTONE
16 Assistant United States Attorney

17
18 
19 JERROD C. PATTERSON
20 Assistant United States Attorney

21
22 
23 ALAN J. PHELPS
24 Trial Attorney